

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: PATRICK LEE OLSON

Debtor

CHAPTER 7

No. 22-11556-mdc

MICHAEL WILEY, successor by assignment
to MCGRATH TECHNICAL STAFFING, INC.
d/b/a MCGRATH SYSTEMS

Plaintiff,

V.

PATRICK LEE OLSON

Defendant.

ADVERSARY ACTION

NO. 22-00058

DEFENDANT PATRICK LEE OLSON'S REMOTE WITNESS LIST

Debtor/Defendant Patrick Lee Olson, by and through his undersigned counsel Mark A. Cronin, Esquire, submits this Remote Witness List in this adversary proceeding pursuant to the Scheduling Order of July 10, 2023 and names the following witnesses in connection with its defense:

1. Patrick Lee Olson (Debtor/Defendant) -- 101 Blossom Way, Pottstown, PA 19465:

Debtor will testify regarding the facts and circumstances regarding his work for McGrath Technical Staffing Solutions, Inc. d/b/a McGrath Systems which was followed by his execution of a Note on April 6, 2018 that resulted in a \$3,678,122.58 default judgment on November 19, 2018 in the Montgomery County Court of Common Pleas and later transferred to the Chester County Court of Common Pleas. Debtor's e-mail address is patrick.olson123@gmail.com. Debtor will be with his undersigned counsel home law office located at 128 Hillside Road, Wayne, PA 19087 at the time of Trial.

2. Michael Wiley (Plaintiff)—Exact address unknown, in Guanacaste region of Costa Rico. Plaintiff will be called to testified the facts and circumstances regarding the Debtor’s work for McGrath Technical Staffing Solutions, Inc. d/b/a McGrath Systems, how the CSS project was purportedly “rolled over” into the other projects, when money was wired from McGrath to Debtor, the alleged causal connection between the forged CSS document and the funds received by Debtor, the circumstances of Debtor’s his execution of a Note on April 6, 2018 that resulted in a \$3,678,122.58 default judgment on November 19, 2018 in the Montgomery County Court of Common Pleas. Moreover, as part of Defendant’s judicial estoppels defense, Plaintiff Wiley shall be examined about his 2020 Chapter 7 bankruptcy, how he claimed McGrath Systems was valued and exempted in his case for only \$1.00 in his 2020 Chapter 7 case, and how that asset was assigned to Plaintiff Wiley from the defunct company post-bankruptcy. The current e-mail address of Plaintiff Wiley is unknown, but transmission of any exhibits will be made through his counsel. Presumably, Mr. Wiley will be in his counsel’s law office in Rosemont, PA—not in Costa Rico—when the Trial commenced Tuesday, August 8, 2023 at 12:30 PM as the court instructed at the March 1, 2023 Pretrial Conference.

Respectfully submitted,

Dated: August 1, 2023

/s/Mark A. Cronin
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